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June 28, 2023

Via ECF

Hon. Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Donna Mays v. United States of America, et al., No. 21 Civ. 3517

Dear Judge Henry:

Our firm represents Plaintiff Donna Mays, as administratrix of the estate of her son, Jamel Floyd, in the above-referenced matter. Per the Court's June 23, 2023 Order, we write on behalf of all parties to provide a status report concerning settlement of this matter.

Following a mediation before Ret. Magistrate Judge Steven Gold on April 3, 2023, the parties reached an agreement in principle to settle this case. As noted in Defendants' June 21, 2023 letter, the parties required additional time to negotiate the inclusion of one provision to the proposed stipulation of settlement. The parties have now reached a resolution regarding that provision and have fully executed a Stipulation of Settlement.

Because Plaintiff Donna Mays brought this action as Administrator of the Estate of her son, Jamel Floyd, Plaintiff now must file a proposed Order of Compromise and request that the Court approve the settlement and Plaintiff's attorneys' fees and costs. *See* N.Y. Estate, Powers & Trusts Law § 5-4.6. To that end, the parties respectfully request that the Court permit Plaintiff to file the proposed Order of Compromise by July 6, 2023, and then file a stipulation of dismissal if the proposed Order of Compromise is so-ordered.

Respectfully submitted,

/s/

Katherine Rosenfeld

Nick Bourland

c. All counsel (via ECF)